



777 South Figueroa Street
Suite 2850
Los Angeles, California 90017
424.652.7800
bakermarquart.com

THE WRITER'S DIRECT DIAL NO.
(424) 652-7814

WRITER'S INTERNET ADDRESS
bklein@bakermarquart.com

Via ECF

October 9, 2020

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Sohrab Sharma and Robert Farkas
CR 18-340-LGS

Dear Judge Schofield:

Defendant Robert Farkas respectfully requests a seven-day extension of the deadline to file his sentencing submission. Even under the proposed new schedule, Mr. Farkas's submission will still be submitted approximately two months before the sentencing date and well before the Court's standard deadline of seven days in advance of the sentencing date. (See Individual Rules and Procedures for Criminal Cases. ¶ J(2).) This request is unopposed by the government.

On October 6, 2020, the Court granted Mr. Farkas's request for a continuance of the sentencing date due to Covid-19 travel logistics, moving his sentencing from October 22, 2020 to December 15, 2020. (Dkt. No. 391.) The Court also set today as the deadline for defendant's submission, with the government submission due on October 15, 2020.^[1]

The defense has been working diligently on Mr. Farkas's sentencing submission since well before September, including this week, and presently has a solid working draft. The defense, however, needs a brief extension of time for a number of compelling reasons. Among

^[1] The defense had requested a sentencing date of November 19, 2020, with October 15, 2020 as its submission due date and October 29, 2020 as the government's.

those reasons, members of the defense team have had a number of unexpected and lengthy court appearances this week that have significantly hampered and interfered with work on the submission. In addition, the defense is still waiting on, analyzing, and incorporating into the submission important materials, including medical records, as well as doing additional legal research and analysis as a result of issues that recently emerged. In light of these facts, the defense respectfully requests this schedule:

- Defense Sentencing Submission – October 16, 2020
- Government Submission – October 30, 2020

For all the above reasons, the Court should grant the defense request for a brief extension of the sentencing submission filing deadlines.

Respectfully submitted,

/s/ Brian E. Klein

Brian E. Klein

Baker Marquart LLP

-and-

Paul D. Petrucci

Law Offices of Paul D. Petrucci PA

-and-

Sanford N. Talkin

Talkin, Muccigrosso & Roberts LLP